

PLAINTIFF'S
EXHIBIT

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DECLARATION OF JAYLA ALLEN

My name is Jayla Allen and I am over the age of 18 and fully competent to make this declaration.

Under penalty of perjury, I declare the following:


1. I am 19 years old and a second-year student at Prairie View A&M University (“PVAMU”).
2. I am a Black registered to vote in the State of Texas in Precinct 309, which is located on PVAMU’s campus at the student center.
3. I am Precinct Chair 309 through the Democratic Party in Waller County.
4. I am also Chair of Rock the Vote at PVAMU and a member of IGNITE at PVAMU.
5. I have used early voting for every election since I started voting while at PVAMU.
6. I would vote during the first week of any scheduled early voting if there were opportunities for me to do so vote at PVAMU. As a student leader, I want to vote as early as possible to set an example for other students. In my various leadership roles, I encourage students to go to the polls and exercise their right to vote. The first week of early voting is easier for me and other students because it’s more convenient and time efficient for students. I strongly believe that the right to vote is fundamental in a democracy such as ours. However, under the current early voting plan, there are no such opportunities on PVAMU’s campus or in Prairie View.
7. PVAMU should get at least the same early voting opportunities as other cities in Waller County under the current plan. Unlike PVAMU students, such as me, other registered voters in Waller County have opportunities to voter during the first week of early voting.

8. In addition, during the second week of early voting, PVAMU is scheduled to have five opportunities for early voting. Of those five opportunities during the second week, two of them are not on campus.
9. Even for myself and other students who have vehicles, the PVAMU student center is a much more convenient and central voting location than any off-campus early voting site; but two early voting days are scheduled to be held off-campus during the second week.
10. Based on my experiences, many students do not have transportation to get to off-campus early voting sites. The on-campus site historically used for early voting, the PVAMU student center, is in a central location and is accessible by foot to students.
11. Given the history of voting barriers faced by PVAMU students, it is surprising that the County insists on moving forward with the current plan that does not provide PVAMU students with the same voting opportunities as other voters in Waller County.
12. Even though I am a Precinct Chair and I am actively involved in voting issues at PVAMU, I did not learn of the elimination of first-week early voting at PVAMU until Friday, October 12, 2018.
13. My commitment to exercising the franchise and encouraging other students to do so stems from my personal convictions. I do not support any decision by representatives of either Waller County political party to agree to a plan that does not give PVAMU students an equal opportunity to participate in early voting.

I declare under penalty of perjury that the forgoing is true and correct.



Jayla Allen



Date